

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 1:20-cr-00342-SEB-MJD
)	
DORIAN LACOURSE,)	
)	
Defendant.)	

GOVERNMENT’S SENTENCING MEMORANDUM

Introduction

By this pleading, the government is outlining what it asserts are the critical factors for the Court’s consideration in determining the appropriate sentence to impose on Defendant Dorian LaCourse. The evidence and argument regarding these factors will be addressed in detail at the sentencing hearing. Additionally, the government will define the significance of the exhibits attached hereto at that time. Following its presentation, the government will seek a sentence of imprisonment of 70 months, which is appropriate to the Defendant’s criminal conduct.

The History and Characteristics of the Defendant

In this case, the nature and circumstances of the offense are explanatory in defining the history and characteristics of the Defendant. Accordingly, the government will focus on the essential components of the nature and circumstances of the offense in this pleading and will address the traditional components of the history and characteristics of the Defendant at the sentencing hearing.

Nature and Circumstances of the Offense

Nothing speaks more clearly to the depth of this Defendant's criminal culpability in this matter than the nature and circumstances of the offenses committed by him. The specific factors in this regard for the Court's consideration and which the government will explain at the sentencing hearing are:

- 1. Abuse of Position of Public Trust**
- 2. Number of Instances of the Offense**
- 3. Longevity of the Offense**
- 4. Manner and Means of the Execution of the Offense**
- 5. Lack of Mitigation and Extenuation**
- 6. Motivation for Offense**
- 7. Impact of Offense**

Based on all of these factors, the government will advocate a sentence of incarceration of 70 months, which it believes is essential to satisfy the purposes of sentencing as defined by Congress in 18 U.S.C. § 3553(a).

Respectfully submitted,

ZACHARY A. MYERS
United States Attorney

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James M. Warden
Assistant United States Attorney

By: s/ William L. McCoskey
William L. McCoskey
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2022 a copy of the foregoing Government's Sentencing Memorandum was filed electronically. Notice of this filing will be sent to all ECF-registered counsel of record via email generated by the Court's ECF system. Parties may access this filing through the Court's system.

By: s/ James M. Warden
James M. Warden
Assistant United States Attorney